## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

WORLD FUEL SERVICES (SINGAPORE)

PTE. LTD. d/b/a BUNKERFUELS

Plaintiff,

V.

C.A. NO. 1:15-cv-00022

ADMIRALTY - RULE 9(h)

M/V MANDARIN GLORY, her engines,
boilers, tackle, furniture, apparel,
appurtenances, etc., in rem

Defendant.

## NOTICE OF FILING LETTER OF UNDERTAKING

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Claimant, Glory Marine Pte. Ltd. (Claimant), through the undersigned counsel and respectfully states as follows:

- 1. On February 12, 2015, World Fuel Services (Singapore) Pte. Ltd. d/b/a Bunkerfuels, filed its Verified Original Complaint alleging a maritime lien on the M/V MANDARIN GLORY for unpaid bunkers supplied to the Vessel on December 9, 2011. Dkt. No. 1. In accordance to Plaintiff's request this Honorable Court issued a Writ of Attachment for the Vessel the M.V MANDARIN GLORY. Dkt. No. 5.
- 2. On February 17, 2015, after holding a hearing on the amount and form of security required to be posted for the release of the Vessel, this Court issued an Order holding that the Vessel "may be automatically released from the arrest order, with no further action from the Court, when the claimant files a letter of undertaking in the amount of \$1,565,000 on the Court's docket." Dkt. No. 12.

3. In compliance and adherence with this Court's Order, the Claimant hereby files a letter of undertaking - in the amount of \$1,565,000. Exhibit 1.

WHEREFORE, PREMISES CONSIDERED, Claimant Glory Marine Pte. Ltd. respectfully requests that the Court accept the included letter of undertaking - in the amount of \$1,565,000, and that the M/V MANDARIN GLORY be released automatically from the arrest order.

Respectfully submitted,

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Attorneys for Claimant, Glory Marine Pte. Ltd.

OF COUNSEL:

EASTHAM, WATSON, DALE & FORNEY, L.L.P.

## **CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I forwarded a true and correct copy of the foregoing instrument to the following counsel of record on this the 18<sup>th</sup> day of February, 2015.

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